

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	No. 25-021 (GMM)
v.)	
)	
DANIELLE BERTOTHY,)	
)	
Defendant.)	

**UNOPPOSED MOTION TO SCHEDULE CHANGE OF PLEA HEARING
AND TO VACATE DEADLINES AND TRIAL DATE**

Danielle Danielle Bertothy, by and through her undersigned counsel, respectfully notifies this Court that she intends to enter a guilty plea in this case pursuant to a written plea agreement. As such, Bertothy requests that this Court schedule a change of plea hearing on July 21, 2025 or July 22, 2025, or at a subsequent date that works for the Court and the parties, and the parties jointly request that this Court vacate the deadlines and dates currently set in this case.

The parties are currently working to finalize the written plea agreement and intend to provide a signed copy to this Court in advance of the change of plea hearing.

Undersigned counsel Justin Gelfand has discussed this matter with Assistant United States Attorney Corinne Corderro, who indicated that the Government has no objections to the requests made in this motion.

Respectfully submitted,

Margulis Gelfand, LLC

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Certificate of Service

I hereby certify that the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the Office of the United States Attorney.

/s/ Justin K. Gelfand

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